

MEMO ENDORSED

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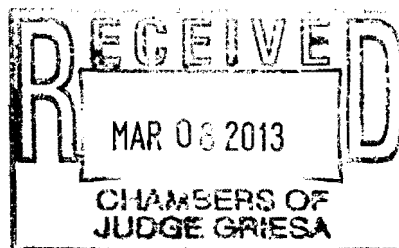
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March 8, 2013

BY HAND

Honorable Thomas P. Griesa
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, New York 10007-1312



Re: *Aurelius Capital Partners, LP v. Rep. of Arg.*, No. 07 Civ. 2715
Aurelius Capital Partners, LP v. Rep. of Arg., No. 07 Civ. 11327
Blue Angel Capital I LLC v. Rep. of Arg., No. 07 Civ. 2693
Aurelius Capital Master, Ltd. v. Rep. of Arg., No. 09 Civ. 8757
Aurelius Capital Master, Ltd. v. Rep. of Arg., No. 09 Civ. 10620
Aurelius Opportunities Fund II, LLC v. Rep. of Arg., No. 10 Civ. 1602
Aurelius Opportunities Fund II, LLC v. Rep. of Arg., No. 10 Civ. 3507
Aurelius Capital Master, Ltd. v. Rep. of Arg., No. 10 Civ. 3970
Blue Angel Capital I LLC v. Rep. of Arg., No. 10 Civ. 4101
Blue Angel Capital I LLC v. Rep. of Arg., No. 10 Civ. 4782
Aurelius Capital Master, Ltd. v. Rep. of Arg., No. 10 Civ. 8339

Dear Judge Griesa:

This firm represents the Plaintiffs in the above-referenced actions. Plaintiffs have served subpoenas on various Banks and their affiliates. Plaintiffs have moved to compel production pursuant to the subpoenas, and certain of the Banks have moved for a protective order or to quash or modify the subpoenas. As set forth below,

Approved:
Thomas P. Griesa
USA 3/15/13

FRIEDMAN KAPLAN SEILER & ADELMAN LLP

Hon. Thomas P. Griesa

- 2 -

March 8, 2013

the schedule for these motions has been the subject of various orders by the Court; Plaintiffs and the Banks are now requesting a further adjournment of the schedule.¹

By Order dated September 18, 2012, Your Honor set a briefing schedule which required the Banks to file their opposition to Plaintiffs' motion to compel on October 31, 2012 and Plaintiffs to file their reply in further support of the motion on November 21, 2012. By Order dated October 24, 2012, Your Honor modified the briefing schedule to allow Bank of America to file its opposition on November 21, 2012 and Plaintiffs to file their reply brief as to Bank of America on December 12, 2012.

As a result of Hurricane Sandy, the Banks (excepting Bank of America) requested extensions of their time to file their oppositions to Plaintiffs' motions to compel, to which Plaintiffs agreed, subject to an extension of their time to reply. The Republic and the Banks filed their oppositions on November 7 and 8 and December 3, 2012. Four of the Banks – Bank of America, Barclays, Citibank, and Deutsche Bank – also cross-moved to quash, modify, or for a protective order. On November 27, 2012, the Court endorsed the schedule to which the parties had agreed, pursuant to which Plaintiffs' reply and their opposition to the cross-motions would be filed on December 21, 2012, and the Banks that had filed cross-motions would file their replies on January 11, 2013.

On December 14, 2012, in light of activity on other Argentina-related matters, Your Honor modified the briefing schedule to permit Plaintiffs to serve their reply and their opposition to the cross-motions on February 4, 2013, and the Banks that have filed cross-motions to serve their replies on February 25, 2013. On January 25, 2013, Your Honor further adjourned the briefing schedule by 45 days, with new dates of March 21 and April 11, 2013, respectively. Plaintiffs and the Banks are again requesting a 45-day adjournment in accordance with the following schedule:

May 6, 2013: Plaintiffs shall serve their reply and their opposition to the cross-motions

May 31, 2013: The Banks that have filed cross-motions shall serve their replies

¹ Up to this point, briefing with respect to the subpoenas served on the Banks has been coordinated with briefing concerning discovery Plaintiffs served on the Republic. By letter dated February 27, 2013, Plaintiffs and the Republic asked the Court to set a separate briefing schedule concerning the discovery served on the Republic, and to set a coordinated hearing concerning discovery from the Republic in these and other Argentina cases – *NML Capital, Ltd. v. The Republic of Argentina*, Nos. 03 Civ. 8845, 05 Civ. 2434, 06 Civ. 6466, 07 Civ. 1910, 2690 & 6563, 08 Civ. 2541, 3302 & 6978, 09 Civ. 1707 & 1708 and *Scheck v. The Republic of Argentina*, No. 10 Civ. 5167. That request is *sub judice*.

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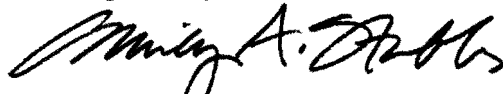
Hon. Thomas P. Griesa

- 3 -

March 8, 2013

We are available to discuss the modified schedule at the Court's convenience. If Your Honor has no objections, we respectfully request that Your Honor "so order" the modified schedule by endorsement of this letter.

Respectfully,



Emily A. Stubbs

cc: Barry Glickman, Esq.
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(all via email)